

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

EMORY STEVE BROWN,	*	CASE NUMBER:
	*	3:05-CV-00681-WKW
Plaintiff,	*	
	*	
v.	*	
	*	
CLAIMS MANAGEMENT, INC.,	*	
	*	
Defendant.	*	

PARTIES' JOINT MOTION TO EXTEND DISCOVERY DEADLINE

COMES NOW the plaintiff, Emory Brown, and the defendant, Claims Management, Inc., by and through counsel, and hereby request that the Court extend the deadline for completion of discovery to February 16, 2007. In support of their joint motion, the parties show unto the Court as follows:

1.

On October 3, 2005, pursuant to Rule 16 of the Federal Rules of Civil Procedure, the Court entered a Uniform Scheduling Order (Court Document No. 8) with respect to the above-styled case. The Scheduling Order was modified by Order of the Court on September 18, 2006 (Court Document No. 42), and again modified by Order of the Court on October 12, 2006 (Court Document No. 46), as follows: the trial originally set for December 4, 2006, is rescheduled for May 14, 2007; the pretrial conference originally set for October 30, 2006, is rescheduled for April 9, 2007.

2.

On October 19, 2006, in response to the motion of the defendant Claims Management, Inc., the Court entered an Order extending the deadline for completion of discovery to December 15, 2006 (Court Document No. 49).

3.

The parties now jointly request that the Court enter an Order extending the deadline for completion of discovery to February 16, 2007.

4.

The extension proposed herein are agreed to by the parties as being in keeping with the general timeframes embodied in the Court's original scheduling order. The proposed extension will leave a period of seven weeks following the close of discovery for preparation for the pre-trial conference, and an additional five weeks thereafter for preparation for trial.

5.

The modifications proposed herein are in keeping with the Federal Rules of Civil Procedure, are submitted in good faith, for no improper purpose, and will not delay or otherwise hinder the trial of this case scheduled for May 14, 2007.

WHEREFORE, for good cause shown, the parties respectfully request that the Court extend the deadlines for completion of discovery as requested, or for such other period of time as the Court deems proper.

This 12th day of December, 2006.

Respectfully submitted,

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I certify that the originally executed document contains the signatures of all filers indicated herein and therefore represents consent for filing of this document.

/s/ Jeffrey A. Brown